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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

RIBALDO OLVERA and IGNACIO GOMEZ
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

AMERICAN CORPORATE SECURITY, A
California Corporation; AMERICAN
CORPORATE SECURITY INC.; and DOES 1-
50,

Defendants.

Case No. 21STCV16417

**DECLARATION OF RIBALDO OLVERA
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT, APPROVAL OF CLASS
NOTICE, SETTING OF FINAL
APPROVAL HEARING DATE**

Date: May 28, 2026

Time: 10:30 a.m.

Dept.: SSC12

DECLARATION OF RIBALDO OLVERA

I, Ribaldo Olvera, declare as follows:

1. I am over the age of eighteen. I submit this Declaration in support of the concurrently filed Motion for Preliminary Approval of the Class and PAGA Action Settlement. The following is based upon my personal knowledge, and if called as a witness, I could and would competently testify regarding the statements in this Declaration.

2. I worked for Defendants American Corporate Security and American Corporate Security, Inc. (“Defendants” or “ACS”) as a non-exempt security officer in approximately May 2019 until my separation with ACS in approximately May 2020. During the Settlement Class Period, my job duties and responsibilities were the same as other non-exempt employees employed by Defendants in California which related to Defendants’ security business.

3. Prior to filing this lawsuit, I searched for an attorney and found James Hawkins, APLC. I never knew James Hawkins, APLC before my consultation with them. After my consultation, I asked them to represent me in bringing a class action on behalf of myself and all other similarly situated non-exempt employees of Defendants.

4. I knew the actions complained of in the complaint not only happened to me but happened to the other employees of Defendants’ that I worked with. I wanted to help the other non-exempt workers vindicate their rights, so I decided to bring the Class and PAGA Action lawsuits that were separately filed on or about April 30, 2021 and on July 22, 2021.

5. I believe my situation is similar and has been similar to all other non-exempt employees like me who worked for Defendants during the class period. The complaint which I brought against Defendants alleges claims on a class and representative basis for the failure to pay wages under California labor laws, failure to provide meal and rest periods, failure to timely pay wages, failure to provide accurate itemized wage statements, unfair business practices, and violation of the Private Attorneys’ General Act (“PAGA”). I believe my claims are typical of the other Class Members, and I can represent our common claims because I believe Defendants applied the same policies, practices and schedules for us all and treated me and all Class Members similarly throughout the class period and in California.

1 6. I believe that my interests have been and continue to be in alignment with the
2 Class Members, and I am willing to continue to pursue and prosecute their class and
3 representative claims against Defendant in this litigation. I believe I do not have any interests
4 which are against the interests of the Class Members, and I will continue to do what is best for all
5 the Class Members rather than myself, as I have done from the beginning of this case.

6 7. My relationship with James Hawkins, APLC is purely an attorney client
7 relationship and there are no other business, familial or social relationships between my attorney
8 and myself. In addition, I do not have any relationship with Defendants other than being a former
9 employee of Defendants. For these reasons, there is no conflict of interest between myself, my
10 attorney, between Defendants, and myself or between the Class and myself.

11 8. As one of the Class Representatives in this case, I participated in every aspect of
12 the litigation and have been apprised of its progress. I believe I have maintained the best interests
13 of the Class Members while performing my Class Representative duties, and I participated in
14 many interviews and conferences with class counsel regarding the conduct and settlement of this
15 matter. I prepared for my deposition, had my deposition taken, provided information regarding
16 Class Member claims to my counsel in support of proving the class claims and establishing what
17 happened to us as a group of employees.

18 9. My counsel has informed me that this information, along with the details and
19 support I provided for my class claims, were very important in convincing Defendants to
20 negotiate the settlement now before the Court for approval. I have also searched for documents to
21 provide to class counsel in support of the class claims, have helped my attorneys with preparing
22 written questions and what documents to ask for, and I have invested a lot of time and effort in
23 performing my duties on behalf of the Class. I also conducted numerous meetings with my
24 counsel to prepare for and discuss Defendants' information requests in advance of the mediation.

25 10. After reviewing the settlement agreement and speaking with my counsel about it,
26 I agreed to sign it on behalf of myself and all the other Class Members. I signed the settlement
27 because I believe the Settlement obtained in this case on behalf of the Class is very fair,
28 sufficient, and reasonable in view of the facts I know and have been made aware of, and due to

the risk of going through further litigation. I believe the average payouts for the class members are very reasonable considering all the facts and evidence and risks moving the case forward to trial.

11. I have not received and understand I will not receive any consideration or promises that are different from any of the other Class Members will receive under the Settlement. I understand this is because all Settlement Class Members who do not ask to be excluded will receive individual settlement payments under the formulas in the settlement agreement, which I understand to be fair.

12. I also understand and believe to be fair the settlement allocation formula and believe it fairly accounts for the individual settlement payments based on the strengths and weaknesses of the various alleged claims and also considering the individual compensation and pay rates for the various class members over the settlement period.

13. I also understand my counsel will request that I be awarded a Class Representative Service Payment of \$15,000.00 for my efforts as a Class Representative, and that this additional payment is not guaranteed, but must be approved by the Court. I believe the requested enhancement payment is fair and reasonable based upon the results we have achieved for the Class Members and because of the tasks I have performed on their behalf, including:

- Review of many documents with my attorneys;
- Preparing for my deposition and having my deposition taken;
- Conducting preparation with my attorneys and participating in responding to information for mediation and to informal discovery requests;
- Several telephone conferences with my attorneys and their representatives;
- Participation in the mediation; and
- Participation in the preliminary approval and eventual final approval process with class counsel and reviewing and signing related documents.

14. I estimate that I have spent approximately 42-47 hours, if not more, helping to prosecute this matter.

1 15. I also believe the requested Class Representative Service Payment is fair and
2 reasonable because my decision to accept the risk of being a Class Representative in a class
3 action under the Labor Code. I voluntarily assumed these real and large risks and the case would
4 not have been brought without me and the other class members. I believe the Class Members will
5 receive a good benefit by resolving their claims against Defendant under the terms of the
6 settlement.

7 16. I declare under penalty of perjury under the laws of California that the foregoing is
8 true and correct. Executed on this 4/08/2026 day of March 2026 at Irvine, California.

DocuSigned by:
Ribaldo Olvera
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RIBALDO OLVERA